# Exhibit 275

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# Compare Results

Old File:

Exhibit 1.pdf

64 pages (1.01 MB) 11/9/21, 8:26:22 PM

New File:

Class Defs FINAL (rev).pdf

64 pages (353 KB) 5/10/22, 3:12:41 PM

**Total Changes** 

199

Text only comparison

Content

Replacement

7 Insertions

69 Deletions

Styling and Annotations

O Styling

O Annotations

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#### MANUFACTURER DEFENDANTS

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#### Manufacturer Defendants Express Warranties Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s) <sup>1</sup>
ZHP <sup>2</sup> ,	ZHPTORTEVEW1	All individuals in Alaska; Arizona;	Any judge or magistrate	Charlie Johnston
Torrent <sup>3</sup> ,		California; Colorado; Delaware; D.C.;	presiding over this	(CA); Brian
Teva <sup>4</sup>		Florida; Hawaii; Idaho; Illinois;	action, and members of	Wineinge♀(IN);
		Indiana; Iowa; Kansas; Kentucky;	their families;	Glenda Cooper
		Maine; Massachusetts; Minnesota		(KY) Marlin
		Missouri; New Jersey; New Mexico;	Defendants and affiliated	Anderson (IL);
		Oklahoma; Pennsylvania; Puerto Rico;	entities, and their	Jennifer Johnson
		Rhode Island; South Carolina; Virginia;	employees, officers,	(MN); James Childs
		Washington; and West Virginia, who,	directors, and agents;	(NJ); Radhakrishna
		since at least January 1, 2012, and		Shetty (NJ); Billy
		through the date of final recall (as of	Defendants' legal	Joe Bruner (NM);
		November 10, 2021), paid any amount	representatives, assigns,	Lawrence Semmel
		of money for a valsartan-containing	and successors; and,	(PA); Cheryl Mullins
		drug (intended for personal or		(VA); Miranda
		household use) that was manufactured,	All persons who properly	Dudley (NC); Mary
		distributed, or sold by the ZHP	execute and file a timely	McLean (VA)
		Defendants, Torrent Defendants, and/or	request for exclusion	

<sup>&</sup>lt;sup>1</sup> These Revised Class Definitions and Exclusions Tables have removed Evelyn Rice (AR), Raleigh Wolfe (IN), and Georgia Fatigato

<sup>&</sup>lt;sup>2</sup> ZHP is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Zhejiang Huahai Pharmaceutical Co., Ltd.; Huahai US Inc.; Prinston Pharmaceutical Inc. d/b/a Solco Healthcare LLC; and Solco Healthcare US, LLC.

Torrent is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Torrent Pharmaceuticals Ltd.; and Torrent Pharma Inc.

Teva is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Teva Pharmaceutical Industries Ltd.; Teva Pharmaceuticals USA, Inc.; Actavis Pharma, Inc.; and Actavis, LLC.

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		Teva Defendants (limited to VCDs	from any Court-approved	
		manufactured using ZHP Defendants'	class.	
		API).	O Taloba	
ZHP,	ZHPTORTEVEW2		Id.	Sandra Kelly (AL), Dennis
Torrent,		Georgia; Mississippi Montana;		Kaplan (OH); Lubertha Powell
Teva		Nebraska; Nevada; New Hampshire;		(GA); Flora McGilvery (MS);
		New York; North Carolina; North		Alphonse Borkowski (NY);
		Dakota; Ohio; Oregon; South Dakota;		Joseph Cacaccio (NY); John
		Tennessee; Texas; Utah; Vermont;		Duffy (NY); Gerald Nelson
		Wisconsin; and Wyoming, who, since at		(NY); Gary Burnett (NC);
		least January 1, 2012, and through the		Miranda Dudley (NC); Eric
		date of final recall (as of November 10,		Erwin (TX); Samuel Cisneros
		2021), paid any amount of money for a		(TX); Jynona Gail Lee (TX)
		valsartan-containing drug (intended for		
		personal or household use) that was		
		manufactured, distributed, or sold by		
		the ZHP Defendants, Torrent		
		Defendants, and/or Teva Defendants		
		(limited to VCDs manufactured using		
		ZHP Defendants' API).		
Mylan <sup>5</sup> , Teva	MYLTEVEW1	All individuals in Alaska; California;	Any judge or magistrate	Marzanna Glab (NJ); James
•		Delaware; D.C.; Florida; Hawaii; Idaho;	presiding over this	Lawson (NJ); James Childs (NJ);
		Illinois; Indiana; Iowa; Kansas;	action, and members of	Mary McLean (VA); Jay Meader
		Kentucky; Maine; Massachusetts;	their families;	(CA); Mark Hays (CA); Glenda
		Minnesota; Missouri; New Jersey; New		Cooper (KY); Robin Roberts
		Mexico; Oklahoma; Pennsylvania;	Defendants and affiliated	(VA)
		Puerto Rico; Rhode Island; South	entities, and their	
		Carolina; Virginia; Washington; and	employees, officers,	
		West Virginia, who, since at least	directors, and agents;	
		January 1, 2012, and through the date of		

<sup>&</sup>lt;sup>5</sup> Mylan is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Mylan Laboratories, Ltd.; Mylan N.V.; and Mylan Pharmaceuticals, Inc.

		final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was	Defendants' legal representatives, assigns, and successors; and,	
		manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Mylan, Teva	MYLTEVEW2	All individuals in Alabama; Arkansas; Georgia; Mississippi Montana; Nebraska; Nevada; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oregon; South Dakota; Tennessee; Texas; Utah; Vermont; Wisconsin; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Id.	Asha Lamy (AL); Lawrence Edwards (GA); Joseph Cacaccio (NY); Gerald Nelson (NY); Eric Erwin (TX); Brittney Means (TX)
Hetero <sup>6</sup>	HETEW1	All individuals in Alaska; California; Delaware; D.C.; Florida; Hawaii; Idaho; Illinois; Indiana; Iowa; Kansas; Kentucky; Maine; Massachusetts;	Any judge or magistrate presiding over this action, and members of their families;	Veronica Longwell (MA); James Childs (NJ); Mark Hays (CA); Leland Gildner (IN)

<sup>&</sup>lt;sup>6</sup> Hetero is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Hetero Labs, Ltd.; Hetero Drugs, Limited; Hetero USA Inc.; and, Camber Pharmaceuticals, Inc.

		Minnesota; Missouri; New Jersey; New		
		Mexico; Oklahoma; Pennsylvania;	Defendants and affiliated	
		Puerto Rico; Rhode Island; South	entities, and their	
		Carolina; Virginia; Washington; and	employees, officers,	
		West Virginia, who, since at least May	directors, and agents;	
		1, 2018, and through the date of final	1934	
		recall (as of November 10, 2021), paid	Defendants' legal	
		any amount of money for a valsartan-	representatives, assigns,	
		containing drug (intended for personal	and successors; and,	
		or household use) that was		
		manufactured, distributed, or sold by	All persons who properly	
		the Hetero Defendants (limited to VCDs	execute and file a timely	
		manufactured using Hetero Defendants'	request for exclusion	
		API).	from any Court-approved	
			class.	
Hetero	HETEW2	All individuals in Connecticut, who,	Id.	Peter O'Brien (CT)
		since at least May 1, 2018, and through		
		the date of final recall (as of November		
		10, 2021), paid any amount of money		
		for a valsartan-containing drug		
		(intended for personal or household use)		
		that was manufactured, distributed, or		
		sold by the Hetero Defendants (limited		
		to VCDs manufactured using Hetero		
		Defendants' API).		
Aurobindo <sup>7</sup>	AUREW1	All individuals in Alaska; California;	Any judge or magistrate	Marlin Anderson (IL); Joseph
		Delaware; D.C.; Florida; Hawaii; Idaho;	presiding over this	Kessinger (KS); Linda Crocker
		Illinois; Indiana; Iowa; Kansas;	action, and members of	(ME); Veronica Longwell (MA);
		Kentucky; Maine; Massachusetts;	their families;	Marzanna Glab (NJ); Antoinette
		Minnesota; Missouri; New Jersey; New		Sims (NJ); James Lawson (NJ);

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<sup>&</sup>lt;sup>7</sup> Aurobindo is defined to include the following Defendant entities as set forth in the Third Amended Master Economic Loss Complaint (Dkt. No. 1708): Aurobindo Pharma, Ltd.; Aurobindo Pharma USA, Inc.; Aurolife Pharma, LLC

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		Mexico; Oklahoma; Pennsylvania;	Defendants and affiliated	James Childs (NJ); Mark Hays
		Puerto Rico; Rhode Island; South	entities, and their	(CA); Merilyn Andre (CA);
		Carolina; Virginia; Washington; and,	employees, officers,	Elenora Deutenberg/Feijoo (FL)
		West Virginia, who, since at least	directors, and agents;	
		January 1, 2012, and through the date of		
		final recall (as of November 10, 2021),	Defendants' legal	
		paid any amount of money for a	representatives, assigns,	
		valsartan-containing drug (intended for personal or household use) that was	and successors; and,	
		manufactured, distributed, or sold by	All persons who properly	
		the Aurobindo Defendants (limited to	execute and file a timely	
		VCDs manufactured using Aurobindo	request for exclusion	
		Defendants' API).	from any Court-approved	
			class.	
Aurobindo	AUREW2	All individuals in Alabama; Arkansas;	Id.	Dennis Kaplan (OH); Lawrence
		Georgia; Mississippi Montana;		Edwards (GA); Jennifer Johnson
		Nebraska; Nevada; New Hampshire;		(MN); Joseph Cacaccio (NY);
		New York; North Carolina; North		Gerald Nelson (NY); Eric Erwin
		Dakota; Ohio; Oregon; South Dakota;		(TX)
		Tennessee; Texas; Utah; Vermont;		
		Wisconsin; and Wyoming, who, since at		
		least January 1, 2012, and through the		
		date of final recall (as of November 10,		
		2021), paid any amount of money for a		
		valsartan-containing drug (intended for		
		personal or household use) that was		
		manufactured, distributed, or sold by		
		the Aurobindo Defendants (limited to		
		VCDs manufactured using Aurobindo		
		Defendants' API).		

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# Manufacturer Defendants Implied Warranty Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
ZHP,	ZHPTORTEVIW1	All individuals in Alaska; California;	Any judge or magistrate	Charlie Johnston (CA);
Torrent,		Colorado; Delaware; D.C.; Hawaii;	presiding over this action, and	Jennifer Johnson (MN); James
Teva		Indiana; Maine; Massachusetts;	members of their families;	Childs (NJ); Radhakrishna
		Minnesota; Missouri; New Jersey;		Shetty (NJ); Billy Joe Bruner
		New Mexico; Oklahoma;	Defendants and affiliated	(NM); Lawrence Semmel
		Pennsylvania; Puerto Rico; Rhode	entities, and their employees,	(PA); Brian Wineinger (IN);
		Island; South Carolina; Firginia; and	officers, directors, and agents;	Mary McLean (VA)
		West Virginia, who, since at least		
		January 1, 2012, and through the date	Defendants' legal	
		of final recall (as of November 10,	representatives, assigns, and	
		2021), paid any amount of money for a	successors; and,	
		valsartan-containing drug (intended for		
		personal or household use) that was	All persons who properly	
		manufactured, distributed, or sold by	execute and file a timely request	
		the ZHP Defendants, Torrent	for exclusion from any Court-	
		Defendants, and/or Teva Defendants	approved class.	
		(limited to VCDs manufactured using		
		ZHP Defendants' API).		
ZHP,	ZHPTORTEVIW2	All individuals in Arkansas; Georgia;	Id.	Lubertha Powell (GA); Flora
Torrent,		Maryland; Michigan; Mississippi;		McGilvery (MS); Eric Erwin
Teva		Montana; Nebraska; Nevada; New		(TX); Cheryl Mullins (VA);
		Hampshire; North Dakota; South		Jynona Gail Lee (TX);
		Dakota; Texas; and Wyoming, who,		Samuel Cisneros (TX)
		since at least January 1, 2012, and		35.77
		through the date of final recall (as of		
		November 10, 2021), paid any amount		
		of money for a valsartan-containing		
		drug (intended for personal or		
		household use) that was manufactured,		
		distributed, or sold by the ZHP		

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		Defendants, Torrent Defendants,		
		, , , , , , , , , , , , , , , , , , , ,		
		and/or Teva Defendants (limited to		
		VCDs manufactured using ZHP		
		Defendants' API).		
ZHP,	ZHPTORTEVIW3	All individuals in Arizona;	Id.	Ron Molinaro (FL); Elenora
Torrent,		Connecticut; Florida; Idaho; Illinois;		Deutenberg/Feijoo (FL);
Teva		Iowa; Kansas; Kentucky; New York;		Marlin Anderson (IL);
		North Carolina; and Washington, who,		Alphonse Borkowski (NY);
		since at least January 1, 2012, and		Joseph Cacaccio (NY); John
		through the date of final recall (as of		Duffy (NY); Gerald Nelson
		November 10, 2021), paid any amount		(NY); Gary Burnett (NC);
		of money for a valsartan-containing		Miranda Dudley (NC)
		drug (intended for personal or		2 . /
		household use) that was manufactured,		
		distributed, or sold by the ZHP		
		Defendants, Torrent Defendants,		
		and/or Teva Defendants (limited to		
		VCDs manufactured using ZHP		
		Defendants' API).		
ZHP,	ZHPTORTEVIW4	All individuals in Alabama; Ohio;	Id.	Sandra Kelly (AL); Dennis
Torrent,	ZINTORIETIWT	Oregon; Tennessee; Utah; and	10.	Kaplan (OH)
Teva		Vermont, who, since at least January 1,		Tupiui (OTI)
Teva		2012, and through the date of final		
		recall (as of November 10, 2021), paid		
		any amount of money for a valsartan-		
		containing drug (intended for personal		
		or household use) that was		
		manufactured, distributed, or sold by		
		the ZHP Defendants, Torrent		
		Defendants, and/or Teva Defendants		
		(limited to VCDs manufactured using		
		ZHP Defendants' API).		
		ZHP Defendants API).		

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ZHP,	ZHPTORTEVIW5	All individuals in Louisiana, who,	Id.	Talsie Neal (LA)
Torrent,		since at least January 1, 2012, and		12 N
Teva		through the date of final recall (as of		
		November 10, 2021), paid any amount		
		of money for a valsartan-containing		
		drug (intended for personal or		
		household use) that was manufactured,		
		distributed, or sold by the ZHP		
		Defendants, Torrent Defendants,		
		and/or Teva Defendants (limited to		
		VCDs manufactured using ZHP		
		Defendants' API).		
Mylan, Teva	MYLTEVIW1	All individuals in Alaska; California;	Any judge or magistrate	Jay Meader (CA); Mark Hays
		Colorado; Delaware; D.C.; Hawaii;	presiding over this action, and	(CA); Marzanna Glab (NJ);
		Indiana; Maine; Massachusetts;	members of their families;	James Lawson (NJ); James
		Minnesota; Missouri; New Jersey;		Childs (NJ); Robin Roberts
		New Mexico; Oklahoma;	Defendants and affiliated	(VA)
		Pennsylvania; Puerto Rico; Rhode	entities, and their employees,	
		Island; South Carolina; Virginia; and	officers, directors, and agents;	
		West Virginia, who, since at least		
		January 1, 2012, and through the date	Defendants' legal	
		of final recall (as of November 10,	representatives, assigns, and	
		2021), paid any amount of money for a	successors; and,	
		valsartan-containing drug (intended for		
		personal or household use) that was	All persons who properly	
		manufactured, distributed, or sold by	execute and file a timely request	
		the Mylan Defendants and/or Teva	for exclusion from any Court-	
		Defendants (limited to VCDs	approved class.	
		manufactured using Mylan		
		Defendants' API).		
Mylan, Teva	MYLTEVIW2	All individuals in Arkansas; Georgia;	Id.	Lawrence Edwards (GA);
		Maryland; Michigan; Mississippi;		Mary McLean (VA); Eric
		Montana; Nebraska; Nevada; New		

		Hampshire; North Dakota; South Dakota; Texas; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants).		Erwin (TX); Brittney Means (TX)
Mylan, Teva	MYLTEVIW3	Mylan Defendants' API).  All individuals in Arizona; Connecticut; Florida; Idaho; Illinois; Iowa; Kansas; Kentucky; New York; North Carolina; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Id.	Joseph Cacaccio (NY); Gerald Nelson (NY)
Mylan, Teva	MYLTEVEW4	All individuals in Alabama; Ohio; Oregon; Tennessee; Utah; and Vermont, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal	Id.	Asha Lamy (AL)

Hetero	HETIW1	or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).  All individuals in Alaska; California;	Any judge or magistrate	Mark Hays (CA); James
		Colorado; Delaware; D.C.; Hawaii; Indiana; Maine; Massachusetts; Minnesota; Missouri; New Jersey; New Mexico; Oklahoma; Pennsylvania; Puerto Rico; Rhode Island; South Carolina; Virginia; and West Virginia, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).	presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors; and,  All persons who properly execute and file a timely request for exclusion from any Courtapproved class.	Childs (NJ); Leland Gildner (IN); Veronica Longwell (MA)
Hetero	HETIW2	All individuals in Arizona; Connecticut; Florida; Idaho; Illinois; Iowa; Kansas; Kentucky; New York; North Carolina; Washington, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or househol	Id.	Peter O'Brien (CT)

		distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).		
Aurobindo	AURIWI	All individuals in Alaska; California; Colorado; Delaware; D.C.; Hawaii; Indiana; Maine; Massachusetts; Minnesota; Missouri; New Jersey; New Mexico; Oklahoma; Pennsylvania; Puerto Rico; Rhode Island; South Carolina; Virginia; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors; and,  All persons who properly execute and file a timely request for exclusion from any Courtapproved class.	Mark Hays (CA); Merilyn Andre (CA); Marzanna Glab (NJ); Antoinette Sims (NJ); James Lawson (NJ); James Childs (NJ); Linda Crocker (ME); Veronica Longwell (MA);
Aurobindo	AURIW2	All individuals in Arkansas; Georgia; Maryland; Michigan; Mississippi; Montana; Nebraska; Nevada; New Hampshire; North Dakota; South Dakota; Texas; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo	Td.	Lawrence Edwards (GA); Jennifer Johnson (MN); Eric Erwin (TX)

		Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).		
Aurobindo	AURIW3	All individuals in Arizona; Connecticut; Florida; Idaho; Illinois; Iowa; Kansas; Kentucky; New York; North Carolina; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Id.	Elenora Deutenberg/Feijoo (FL); Marlin Anderson (IL); Joseph Cacaccio (NY); Gerald Nelson (NY);
Aurobindo	AURIW4	All individuals in Alabama; Ohio; Oregon; Tennessee; Utah; and Vermont, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Id.	Dennis Kaplan (OH)
Aurobindo	AURIW5	All individuals in Louisiana, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount	Id.	Sandy Bell (LA)

of money for a valsartan-containing	
drug (intended for personal or	
household use) that was manufactured,	
distributed, or sold by the Aurobindo	
Defendants (limited to VCDs	
manufactured using Aurobindo	
Defendants' API).	

## Manufacturer Defendants Common Law Fraud Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
ZHP,	ZHPTORTEVFR1	All individuals in Alaska;	Any judge or magistrate presiding	Charlie Johnston (CA);
Torrent,		California; Connecticut;	over this action, and members of	Lubertha Powell (GA); Brian
Teva		Delaware; Georgia; Indiana;	their families;	Wineinger (IN? Glenda
		Kansas; Kentucky; Maine;		Cooper (KY); Billy Joe Brune
		Maryland; Massachusetts;	Defendants and affiliated entities,	(NM); Dennis Kaplan (OH);
		Michigan; Nebraska; New	and their employees, officers,	Lawrence Semmel (PA); Eric
		Hampshire; New Mexico;	directors, and agents;	Erwin (TX); Jynona Gail Lee
		Ohio; Pennsylvania; South		(TX); Samuel Cisneros (TX)
		Carolina; South Dakota;	Defendants' legal representatives,	
		Tennessee; Texas; Utah; West	assigns, and successors; and,	
		Virginia; and Wisconsin, who,		
		since at least January 1, 2012,	All persons who properly execute	
		and through the date of final	and file a timely request for	
		recall (as of November 10,	exclusion from any Court-approved	
		2021), paid any amount of	class.	
		money for a valsartan-		
		containing drug (intended for		
		personal or household use) that		
		was manufactured, distributed,		
		or sold by the ZHP Defendants,		
		Torrent Defendants, and/or		
		Teva Defendants (limited to		
		VCDs manufactured using ZHP		
		Defendants' API).		
ZHP,	ZHPTORTEVFR2	All individuals in Alabama;	Id.	Sandra Kelly (AL) Marlin
Torrent,		Arizona; Arkansas; Hawaii;		Anderson (IL); Jennifer
Teva		Idaho; Illinois; Minnesota;		Johnson (MN); Flora
		Mississippi; Missouri;		McGilvery (MS)
		Montana; Nevada; and Oregon,		
		who, since at least January 1,		

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ZHP,	ZHPTORTEVFR3	2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants, and/or Teva Defendants (limited to VCDs manufactured using ZHP Defendants' API).  All individuals in Colorado;	Id.	Ron Molinaro (FL); Talsie
Torrent, Teva		D.C.; Florida; Iowa; Louisiana; New Jersey; New York; North Carolina; North Dakota; Oklahoma; Rhode Island; Vermont; Virginia; Washington; Wyoming; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants (limited to VCDs manufactured using ZHP Defendants' API).		Neal (LA); James Childs (NJ); Radhakrishna Shetty (NJ); Alphonse Borkowski (NY); Joseph Cacaccio (NY); John Duffy (NY); Gerald Nelson (NY); Gary Burnett (NC); Miranda Dudley (NC); Cheryl Mullins (VA); Mary McLean (VA)

Mylan, Teva	MYLTEVFRI	All individuals in Alaska; California; Connecticut; Delaware; Georgia; Indiana; Kansas; Kentucky; Maine; Maryland; Massachusetts; Michigan; Nebraska; New Hampshire; New Mexico; Ohio; Pennsylvania; South Carolina; South Dakota; Tennessee; Texas; Utah; West Virginia; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors; and,  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Jay Meader (CA); Mark Hays (CA); Lawrence Edwards (GA); Glenda Cooper (KY); Eric Erwin (TX); Brittney Means (TX)
Mylan, Teva	MYLTEVFR2	All individuals in Alabama; Arizona; Arkansas; Hawaii; Idaho; Illinois; Minnesota; Mississippi; Missouri; Montana; Nevada; and Oregon,who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any	Id.	Asha Lamy (AL)

		amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).		
Mylan, Teva	MYLTEVFR3	All individuals in Colorado; D.C.; Florida; Iowa; Louisiana; New Jersey; New York; North Carolina; North Dakota; Oklahoma; Rhode Island; Vermont; Virginia; Washington; Wyoming; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Id.	Marzanna Glab (NJ); James Lawson (NJ); James Childs (NJ); Joseph Cacaccio (NY); Gerald Nelson (NY); Mary McLean (VA); Robin Roberts (VA)
Hetero	HETFR1	All individuals in Alaska; California; Connecticut; Delaware; Georgia; Indiana; Kansas; Kentucky; Maine;	Any judge or magistrate presiding over this action, and members of their families;	Mark Hays (CA); Peter O'Brien (CT); Leland Gildner (IN); Veronica Longwell (MA)

<del></del>				
		Maryland; Massachusetts;	Defendants and affiliated entities,	
		Michigan; Nebraska; New	and their employees, officers,	
		Hampshire; New Mexico;	directors, and agents;	
		Ohio; Pennsylvania; South		
		Carolina; South Dakota;	Defendants' legal representatives,	
		Tennessee; Texas; Utah; West	assigns, and successors; and,	
		Virginia; and Wisconsin, who,	_	
		since at least May 1, 2018, and	All persons who properly execute	
		through the date of final recall	and file a timely request for	
		(as of November 10, 2021),	exclusion from any Court-approved	
		paid any amount of money for	class.	
		a valsartan-containing drug		
		(intended for personal or		
		household use) that was		
		manufactured, distributed, or		
		sold by the Hetero Defendants		
		(limited to VCDs manufactured		
		using Hetero Defendants' API).		
Hetero	HETFR2	All individuals in Colorado;	Id.	James Childs (NJ)
		D.C.; Florida; Iowa; Louisiana;		
		New Jersey; New York; North		
		Carolina; North Dakota;		
		Oklahoma; Rhode Island;		
		Vermont; Virginia;		
		Washington; Wyoming; and		
		Puerto Rico, who, since at least		
		May 1, 2018, and to the date of		
		final recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-		
		containing drug (intended for		
		personal or household use) that		
		was manufactured, distributed,		

		or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).		
Aurobindo	AURFR1	All individuals in Alaska; California; Connecticut; Delaware; Georgia; Indiana; Kansas; Kentucky; Maine; Maryland; Massachusetts; Michigan; Nebraska; New Hampshire; New Mexico; Ohio; Pennsylvania; South Carolina; South Dakota; Tennessee; Texas; Utah; West Virginia; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors; and,  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Mark Hays (CA); Merilyn Andre (CA); Lawrence Edwards (GA); Joseph Kessinger (KS); Dennis Kaplan (OH); Eric Erwin (TX); Veronica Longwell (MA); Linda Crocker (ME);
Aurobindo	AURFR2	All individuals in Alabama; Arizona; Arkansas; Hawaii; Idaho; Illinois; Minnesota; Mississippi; Missouri; Montana; Nevada; and Oregon, who, since at least January 1,	1€.	Marlin Anderson (IL); Jennife Johnson (MN);

		2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).		
Aurobindo	AURFR3	All individuals in Colorado; D.C.; Florida; Iowa; Louisiana; New Jersey; New York; North Carolina; North Dakota; Oklahoma; Rhode Island; Vermont; Virginia; Washington; Wyoming; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo	Id.	Elenora Deutenberg/Feijoo (FL); Sandy Bell (LA); Marzanna Glab (NJ); Antoinette Sims (NJ); James Lawson (NJ); Joseph Cacaccio (NY); Gerald Nelson (NY)

# Manufacturer Defendants Consumer Protection Act Claim

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
ZHP,	ZHPTORTEVCPA1	All individuals in Alaska;	Any judge or magistrate	Charlie Johnston (CA); Ron
Torrent,		Arizona; California (§	presiding over this action, and	Molinaro (FL); Elenora
Teva		17200 UCL only);	members of their families;	Deutenberg/Feijoo (FL); Marlin
		Connecticut; D.C.;		Anderson (ILS Alphonse Borkowski
		Florida; Hawaii; Idaho;	Defendants and affiliated	(NY); Joseph Cacaccio (NY); John
		Illinois; Maryland;	entities, and their employees,	Duffy (NY); Gerald Nelson (NY);
		Missouri; Montana;	officers, directors, and agents;	Gary Burnett (NC); Miranda Dudley
		Nebraska; New		(NC); Dennis Kaplan (OH);
		Hampshire; New York;	Defendants' legal	Lawrence Semmel (PA)
		North Carolina; North	representatives, assigns, and	1000
		Dakota; Ohio; Oklahoma;	successors; and,	
		Oregon; Pennsylvania;	500	
		Puerto Rico; South	All persons who properly	
		Carolina; Tennessee;	execute and file a timely request	
		Vermont; and	for exclusion from any Court-	
		Washington, who, since at	approved class.	
		least January 1, 2012, and		
		through the date of final		
		recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-		
		containing drug (intended		
		for personal or household		
		use) that was		
		manufactured, distributed,		
		or sold by the ZHP		
		Defendants, Torrent		
		Defendants, and/or Teva		
		Defendants (limited to		

		VCDs manufactured using ZHP Defendants' API).		
ZHP, Torrent, Teva	ZHPTORTEVCPA2	All individuals in Delaware; Kansas; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the ZHP Defendants, Torrent Defendants (limited to VCDs manufactured using ZHP Defendants' API).	Id.	Jennifer Johnson (MN); James Childs (NJ); Radhakrishna Shetty (NJ)
ZHP, Torrent, Teva	ZHPTORTEVCPA3	All individuals in Alabama; Georgia; Maine; Massachusetts; Mississippi; Texas; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for	Id.	Sandra Kelly (AL); Lubertha Powell (GA); Flora McGilvery (MS); Eric Erwin (TX); Brittney Means (TX); Samuel Cisneros (TX); Jynona Gail Lee (TX)

		personal or household use		
		that was manufactured.		
		distributed, or sold by the		
		ZHP Defendants, Torrent		
		Defendants, and/or Teva		
		Defendants (limited to		
		VCDs manufactured using		
FALTE	aumana manuan i i	ZHP Defendants' API).	7.1	Glanda Garage (VV), Talaia Mani
ZHP,	ZHPTORTEVCPA4		Id.	Glenda Cooper (KY); Talsie Neal
Torrent,		Arkansas; Colorado;		(LA); Billy Joe Bruner (NM);
Teva		Kentucky; Louisiana;		Lawrence Semmel (PA); Cheryl
		Nevada; New Mexico;		Mullins (VA); Robin Roberts (VA);
		South Dakota; Utah; and		Mary McLean (VA)
		Virginia, who, since at		
		least January 1, 2012, and		
		through the date of final		
		recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-		
		containing drug (intended		
		for personal or household		
		use) that was		
		manufactured, distributed,		
		or sold by the ZHP		
		Defendants, Torrent		
		Defendants, and/or Teva		
		Defendants (limited to		
		VCDs manufactured using		
		ZHP Defendants' API).		
ZHP,	ZHPTORTEVCPA5	All individuals in Indiana;	Id.	Brian Wineinger (IN);
Torrent,		and Wyoming, who, since		
Teva		at least January 1, 2012,		
		and through the date of		

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		final recall (as of		
		November 10, 2021), paid 9		
		any amount of money for		
		a valsartan-containing		
		drug (intended for		
		personal or household use)		
		that was manufactured,		
		distributed, or sold by the		
		ZHP Defendants, Torrent		
		Defendants, and/or Teva		
		Defendants (limited to		
		VCDs manufactured using		
		ZHP Defendants' API).		
Mylan, Teva	MYLTEVCPA1	All individuals in Alaska;	Any judge or magistrate	Jay Meader (CA); Mark Hays (CA);
	100 100 100 100 100 100 100 100 100 100	Arizona; California (§	presiding over this action, and	Peter O'Brien (CT); Joseph Cacaccio
		17200 UCL only);	members of their families;	(NY); Gerald Nelson (NY)
		Connecticut; D.C.;		55
		Florida; Hawaii; Idaho;	Defendants and affiliated	
		Illinois; Maryland;	entities, and their employees,	
		Missouri; Montana;	officers, directors, and agents;	
		Nebraska; New		
		Hampshire; New York;	Defendants' legal	
		North Carolina; North	representatives, assigns, and	
		Dakota; Ohio; Oklahoma;	successors; and,	
		Oregon; Pennsylvania;		
		Puerto Rico; South	All persons who properly	
		Carolina; Tennessee;	execute and file a timely request	
		Vermont; and	for exclusion from any Court-	
		Washington, who, since at	approved class.	
		least January 1, 2012, and	***	
		through the date of final		
		recall (as of November 10,		
		2021), paid any amount of		

		money for a valsartan- containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).		
Mylan, Teva	MYLTEVCPA2	All individuals in Delaware; Kansas; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Id.	Marzanna Glab (NJ); James Lawson (NJ); James Childs (NJ);
Mylan, Teva	MYLTEVCPA3	All individuals in Alabama; Georgia; Maine; Massachusetts; Mississippi; Texas; and	Id.	Asha Lamy (AL); Lawrence Edwards (GA); Eric Erwin (TX); Brittney Means (TX);

West Virginia, who, since at least Januar (%), 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).  Mylan, Teva MYLTEVCPA4 All individuals in Arkansas; Colorado; Kentucky; Louisiana; Nevada; New Mexico; South Dakota; Utah; and Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10 2021), paid any amount o money for a valsartancontaining drug (intended for personal or household use) that was manufactured, distributed or sold by the Mylan	Id.	Glenda Cooper (KY); Mary McLean (VA); Robin Roberts (VA);
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		Defendants (limited to VCDs manufacture? sing Mylan Defendants' API).		
Mylan, Teva	MYLTEVCPA5	All individuals in Indiana; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Mylan Defendants and/or Teva Defendants (limited to VCDs manufactured using Mylan Defendants' API).	Id.	Leland Gildner (IN)
Hetero	НЕТСРА1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Illinois; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Puerto Rico; South	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors; and,	Mark Hays (CA); Peter O'Brien (CT);

Hetero	HETCPA2	Carolina; Tennessee; Vermont; and Washington, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was manufactured, distributed, or sold by the Hetero Defendants (limited to VCDs manufactured using Hetero Defendants' API).  All individuals in Delaware; Kansas; Minnesota; New Jersey; and Wisconsin, who, since at least May 1, 2018, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was manufactured, distributed, or sold by the Hetero Defendants (limited to	All persons who properly execute and file a timely request for exclusion from any Courtapproved class.	James Childs (NJ)

Hetero	НЕТСРА3	All individuals in Indiana;	Id.	Leland Gildner (IN)
		and Wyoming, who, since		
		at least May 1, 2018, and		
		through the date of final		
		recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-		
		containing drug (intended		
		for personal or household		
		use) that was		
		manufactured, distributed,		
		or sold by the Hetero		
		Defendants (limited to		
		VCDs manufactured using		
		Hetero Defendants' API).		
Aurobindo	AURCPA1	All individuals in Alaska;	Any judge or magistrate	Mark Hays (CA); Merilyn Andre
		Arizona; California (§	presiding over this action, and	(CA); Elenora Deutenberg/Feijoo
		17200 UCL only);	members of their families;	(FL); Marlin Anderson (ILO Joseph
		Connecticut; D.C.;		Cacaccio (NY); Gerald Nelson
		Florida; Hawaii; Idaho;	Defendants and affiliated	(NY); Dennis Kaplan (OH)
		Illinois; Maryland;	entities, and their employees,	
		Missouri; Montana;	officers, directors, and agents;	
		Nebraska; New		
		Hampshire; New York;	Defendants' legal	
		North Carolina; North	representatives, assigns, and	
		Dakota; Ohio; Oklahoma;	successors; and,	
		Oregon; Pennsylvania;	7 W. W.	
		Puerto Rico; South	All persons who properly	
		Carolina; Tennessee;	execute and file a timely request	
		Vermont; and	for exclusion from any Court-	
		Washington, who, since at	approved class.	
		least January 1, 2012, and		
		through the date of final		

	recall (as of November 10,		
	2021), paid any amount of		
1	money for a valsartan-		
	The state of the s		
ALIDCDAD		Id	Joseph Kessinger (KS); Jennifer
AURCIAZ		iu.	Johnson (MN); Marzanna Glab (NJ);
			Antoinette Sims (NJ); James Lawson
	The state of the s		(NJ); James Childs (NJ)
			()
	final recall (as of		
	November 10, 2021), paid		
	a valsartan-containing		
	drug (intended for		
	personal or household use)		
	AURCPA2	2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).  AURCPA2  All individuals in Delaware; Kansas; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for	2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants' API).  AURCPA2  All individuals in Delaware; Kansas; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was manufactured, distributed, or sold by the Aurobindo Defendants (limited to VCDs manufactured using Aurobindo Defendants'

Aurobindo	AURCPA3	All individuals in	Id.	Lawrence Edwards (GA); Linda
		Alabama; Georgia; Maine;		Crocker (ME); Veronica Longwell
		Massachusetts;		(MA); Eric Erwin (TX)
		Mississippi; Texas; and		1
		West Virginia, who, since		
		at least January 1, 2012,		
		and through the date of		
		final recall (as of		
		November 10, 2021), paid		
		any amount of money for		
		a valsartan-containing		
		drug (intended for		
		personal or household use)		
		that was manufactured,		
		distributed, or sold by the		
		Aurobindo Defendants		
		(limited to VCDs		
		manufactured using		
		Aurobindo Defendants'		
		API).		
Aurobindo	AURCPA4	All individuals in	Id.	Sandy Bell (LA)
		Arkansas; Colorado;		
		Kentucky; Louisiana;		
		Nevada; New Mexico;		
		South Dakota; Utah; and		
		Virginia, who, since at		
		least January 1, 2012, and		
		through the date of final		
		recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-		
		containing drug (intended		
		for personal or household		

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use) that was manufactured, stributed,	
or sold by the Aurobindo Defendants (limited to	
VCDs manufactured using Aurobindo Defendants'	
API).	

#### RETAIL PHARMACY DEFENDANTS

# Retail Pharmacy Defendants Implied Warranty Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
Walgreens	WALIWI	All individuals in Alaska; Colorado; Delaware; District of Columbia; Hawaii; Indiana; New Mexico; Oklahoma; Pennsylvania; and Rhode Island, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartancontaining drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Walgreens prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Billy Joe Bruner (NM)
CVS	CVSIW1 9	All individuals in Alaska; Colorado; Delaware; District of Columbia; Hawaii; Indiana; New	Any judge or magistrate presiding over this action, and members of their families;	Lawrence Semmel (PA)

		Mexico; Oklahoma; Pennsylvania; and Rhode Island, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartancontaining drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by CVS prior to May 1, 2018;  All persons who properly execute and file a timely request for	
Walmart	WMTIW1	All individuals in Alaska; Colorado; Delaware; District of Columbia; Hawaii; Indiana; New Mexico; Oklahoma; Pennsylvania; and Rhode Island, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended	exclusion from any Court-approved class.  Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartancontaining drug purchases (intended	Brian Wineinger (IN)

		for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Walmart (including Sam's Club locations) prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Kroger	KROIW1	All individuals in Alaska; Colorado; Delaware; District of Columbia; Hawaii; Indiana; New Mexico; Oklahoma; Pennsylvania; and Rhode Island, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant The Kroger, Co., and manufactured, distributed, or sold by any	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartancontaining drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Kroger prior to May 1, 2018;	Leland Gildner (IN)

	of the Manufacturer Defendants. ?	All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
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### Retail Pharmacy Defendants' Consumer Protection Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
Defendant(s)  CVS  Consumer  Protection  Act State  Grouping  No. 1	Subclass Name CVSCPA1	Definition  All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Illinois; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Puerto Rico; South Carolina; Tennessee; Vermont; Washington; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including	Exclusion(s)  Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by CVS prior to May 1, 2018;	Class Representative(s) Jay Meader (CA); Mark Hays (CA); Peter O'Brien (CT); Ron Molinaro (FL); Elenora Deutenberg/Feijoo (FL); Marlin Anderson (IL); Sandy Bell (LA); Lawrence Semmel (PA)
on to		Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
CVS Consumer Protection Act State	CVSCPA2	All individuals in Delaware; Kansas; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and	Id.	Marzanna Glab (NJ); James Lawson (NJ)

Grouping		through the date of final recall		
No. 2		(as of November 10, 2021), paid		
140. 2		any amount of money for a		
		valsartan-containing drug		
		(intended for personal or		
		household use) that was		
		dispensed by Defendant CVS		
		Pharmacy, Inc. (including Target		
		locations), and manufactured,		
		distributed, or sold by any of the		
		Manufacturer Defendants.		
CVS	CVSCPA3	All individuals in Alabama;	Id.	Lawrence Edwards (GA);
Consumer		Georgia; Maine; Massachusetts;		Veronica Longwell (MA); Brittney
Protection		Mississippi; amd Texas, who,		Means (TX)
Act State		since at least January 1, 2012,		
Grouping		and through the date of final		
No. 3		recall (as of November 10,		
25020098900		2021), paid any amount of		
		money for a valsartan-containing		
		drug (intended for personal or		
		household use) that was		
		dispensed by Defendant CVS		
		Pharmacy, Inc. (including Target		
		locations), and manufactured,		
		distributed, or sold by any of the		
		Manufacturer Defendants.		
Walgreens	WALCPA1	All individuals in Alaska;	Any judge or magistrate	Elenora Deutenberg/Feijoo (FL);
Consumer	WALCIAI	Arizona; California (§ 17200	presiding over this action, and	John Duffy (NY)
Protection		UCL only); Connecticut; D.C.;	members of their families;	
Act State		Florida; Hawaii; Idaho; Illinois;	members of their families,	
		Louisiana; Maryland; Missouri;	Defendants and affiliated	
Grouping		Montana; Nebraska; New	entities, and their employees,	
No. 1			officers, directors, and agents;	
		Hampshire; New York; North	officers, directors, and agents;	

		Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Puerto Rico; South Carolina; Tennessee; Vermont; Washington; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Walgreens prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Walgreens Consumer Protection Act State Grouping No. 2	WALCPA2	All individuals in Delaware; Kansas; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or	Id.	Radhakrishna Shetty (NJ)

		sold by any of the Manufacturer Defendants.		
Walgreens Consumer Protection Act State Grouping No. 3	WALCPA3	All individuals in Alabama; Georgia; Maine; Massachusetts; Mississippi; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Lubertha Powell (GA); Eric Erwin (TX); Brittney Means (TX)
Rite-Aid Consumer Protection Act State Grouping No. 1	RITCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Illinois; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Puerto Rico; South Carolina; Tennessee; Vermont; Washington; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartan-containing drug purchases (intended for personal or household use),	Alphonse Borkowski (NY); Joseph Cacaccio (NY); Gerald Nelson (NY); Dennis Kaplan (OH)

		amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant Rite-Aid Corporation, and manufactured, distributed, or sold by any of the Manufacturer Defendants.	who would otherwise meet this Class Definition, were Hetero Defendants' valsartancontaining drugs dispensed by Rite-Aid prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Rite-Aid Consumer Protection Act State Grouping No. 2	RITCPA2	All individuals in Alabama; Georgia; Maine; Massachusetts; Mississippi; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Rite-Aid Corporation, and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Lawrence Edwards (GA)
Walmart Consumer Protection Act State Grouping No. 1	WMTCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Illinois; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon;	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;	Talsie Neal (LA); Gary Burnett (NC)

		Pennsylvania; Puerto Rico; South Carolina; Tennessee; Vermont; Washington; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Walmart (including Sam's Club locations) prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Walmart Consumer Protection Act State Grouping No. 2	WMTCPA2	All individuals in Delaware; Kansas; Minnesota; New Jersey; and Wisconsin, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's	Id.	Jennifer Johnson (MN)

		Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
Walmart Consumer Protection Act State Grouping No. 3	WMTCPA3	All individuals in Alabama; Georgia; Maine; Massachusetts; Mississippi; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Flora McGilvery (MS); Jynona Gail Lee (TX); Samuel Cisneros (TX)
Express Scripts Consumer Protection Act State Grouping No. 1	ESICPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Illinois; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Puerto Rico; South Carolina; Tennessee; Vermont; Washington; and West Virginia, who, since at least	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;	Mark Hays (CA); Merilyn Andre (CA)

		January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was dispensed by Defendant Express Scripts, Inc., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Express Scripts prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Kroger Consumer Protection Act State Grouping No. 1	KROCPA1	All individuals in Alabama; Georgia; Maine; Massachusetts; Mississippi; and Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant The Kroger, Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this	Asha Lamy (AL)

			Class Definition, were Hetero Defendants' valsartan- containing drugs dispensed by Kroger prior to May 1, 2018; All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
OptumRx Consumer Protection Act State Grouping No. 1	OPTCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Illinois; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Puerto Rico; South Carolina; Tennessee; Vermont; Washington; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant OptumRx, and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by OptumRx prior to May 1, 2018;	Charlie Johnston (CA)

			All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Albertson's Consumer Protection Act State Grouping No. I	ALBCPA1	All individuals in Alaska; Arizona; California (§ 17200 UCL only); Connecticut; D.C.; Florida; Hawaii; Idaho; Illinois; Louisiana; Maryland; Missouri; Montana; Nebraska; New Hampshire; New York; North Carolina; North Dakota; Ohio; Oklahoma; Oregon; Pennsylvania; Puerto Rico; South Carolina; Tennessee; Vermont; Washington; and West Virginia, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was dispensed by Defendant Albertson's LLC (including Sav- On), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Albertson's (including Sav-On) prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Merilyn Andre (CA)

# Retail Pharmacy Defendants' Unjust Enrichment Claim:

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
CVS Unjust Enrichment Grouping No. 1	CVSUE1	All individuals in Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by CVS prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Brittney Means (TX)
CVS Unjust Enrichment Grouping No. 2	CVSUE2	All individuals in Arizona; Arkansas; Connecticut; Maryland; Minnesota; Rhode Island; Vermont; and Wyoming,	Id.	Peter O'Brien (CT)

		who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.		
CVS Unjust Enrichment Grouping No. 3	CVSUE3	All individuals in Alaska; Delaware; Florida; Georgia; Idaho; Nebraska; New Jersey; North Dakota; Ohio; Pennsylvania; Virginia; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant CVS Pharmacy, Inc. (including Target locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Marzanna Glab (NJ); James Lawson (NJ); Ronald Molinaro (FL); Larry Semmel (PA); Lawrence Edwards (GA); Fernando Feijoo (son of Elenora Deutenberg) (FL)
CVS Unjust Enrichment	CVSUE4	All individuals in California; Colorado; D.C.; Hawaii; Illinois; Indiana; Iowa; Kansas;	Id.	Marlin Anderson (IL); Sandy Bell (LA); Mark Hays (CA); Joseph Kessinger (KS); Jay

Grouping		Louisiana; Maine;		Meader (CA); Veronica
No. 4		Massachusetts; Mississippi;		Longwell (MA)
		Missouri; Nevada; New Mexico;		
		New York; North Carolina;		
		Oklahoma; Oregon; South		
		Carolina; South Dakota;		
		Tennessee; Utah; and, Puerto		
		Rico, who, since at least January		
		1, 2012, and through the date of		
		final recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-containing		
		drug (intended for personal or		
		household use) that was		
		dispensed by Defendant CVS		
		Pharmacy, Inc. (including Target		
		locations), and manufactured,		
		distributed, or sold by any of the		
		Manufacturer Defendants.		
Walgreens	WALUE1	All individuals in Texas, who,	Any judge or magistrate	Eric Erwin (TX); Brittney Means
Unjust		since at least January 1, 2012,	presiding over this action, and	(TX)
Enrichment		and through the date of final	members of their families;	
Grouping		recall (as of November 10,	Defendants and affiliated	
No. 1		2021), paid any amount of	entities, and their employees,	
		money for a valsartan-containing drug (intended for personal or	officers, directors, and agents;	
		household use) that was	officers, directors, and agents,	
		dispensed by Defendant	Defendants' legal	
		Walgreens Co., and	representatives, assigns, and	
		manufactured, distributed, or	successors;	
		sold by any of the Manufacturer		
		Defendants.	Individuals whose only	
			valsartan-containing drug	

Walgreens Unjust Enrichment Grouping No. 2	WALUE2	All individuals in Alaska; Delaware; Florida; Georgia; Idaho; Nebraska; New Jersey; North Dakota; Ohio; Pennsylvania; Virginia; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walgreens Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartancontaining drugs dispensed by Walgreens prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.  Id.	Lubertha Powell (GA); Fernando Feijoo (son of Elenora Deutenberg) (FL); Robin Roberts (VA); Radhakrishna Shetty (NJ)
Walgreens Unjust	WALUE3	All individuals in California; Colorado; D.C.; Hawaii; Illinois;	Id.	Marlin Anderson (IL); Billy Joe Bruner (NM); John Duffy (NY)

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Enrichment		Indiana; Iowa; Kansas;		
Grouping No. 3		Louisiana; Maine;		
NO. 3		Massachusetts; Mississippi; Missouri: Nevada: New Mexico;		
		New York; North Carolina;		
		Oklahoma; Oregon; South		
		Carolina; South Dakota; Tennessee; Utah; and Puerto		
		Rico, who, since at least January		
		1, 2012, and through the date of final recall (as of November 10,		
		2021), paid any amount of		
		money for a valsartan-containing		
		drug (intended for personal or		
		household use) that was		
		dispensed by Defendant		
		Walgreens Co., and		
		manufactured, distributed, or		
		sold by any of the Manufacturer		
		Defendants.		
Rite-Aid	RITUE1	All individuals in Alaska;	Any judge or magistrate	Dennis Kaplan (OH); Lawrence
Unjust		Delaware; Florida; Georgia;	presiding over this action, and	Edwards (GA)
Enrichment		Idaho; Nebraska; New Jersey;	members of their families;	
Grouping		North Dakota; Ohio;		
No. 1		Pennsylvania; Virginia; and	Defendants and affiliated	
		Washington, who, since at least	entities, and their employees,	
		January 1, 2012, and through the	officers, directors, and agents;	
		date of final recall (as of		
		November 10, 2021), paid any	Defendants' legal	
		amount of money for a	representatives, assigns, and	
		valsartan-containing drug	successors;	
		(intended for personal or		
		household use) that was		

		dispensed by Defendant Rite- Aid Corporation, and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan- containing drugs dispensed by Rite-Aid prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Rite-Aid Unjust Enrichment Grouping No. 2	RITUE2	All individuals in California; Colorado; D.C.; Hawaii; Illinois; Indiana; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico; New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Rite- Aid Corporation, and	Id.	Alphonse Borkowski (NY); Joseph Cacaccio (NY); Gerald Nelson (NY)

		manufactured, distributed, or sold by any of the Manufacturer Defendants.		
Walmart Unjust Enrichment Grouping No. 1	WMTUEI	All individuals in Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Walmart (including Sam's Club locations) prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Samuel Cisneros (TX); Jyona Gail Lee (TX);

Walmart Unjust Enrichment Grouping No. 2	WMTUE2	All individuals in Arizona; Arkansas; Connecticut; Maryland; Minnesota; Rhode Island; Vermont; Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Jennifer Johnson (MN)
Walmart Unjust Enrichment Grouping No. 3	WMTUE3	All individuals in Alaska; Delaware; Florida; Georgia; Idaho; Nebraska; New Jersey; North Dakota; Ohio; Pennsylvania; Virginia; and Washington, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's Club locations), and	Id.	Robin Roberts (VA)

		manufactured, distributed, or sold by any of the Manufacturer Defendants.		F
Walmart Unjust Enrichment Grouping No. 4	WMTUE4	All individuals in California; Colorado; D.C.; Hawaii; Illinois; Indiana; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico; New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Walmart Stores, Inc. (including Sam's Club locations), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Id.	Gary Burnett (NC): Flora McGilvery (MS); Talsie Neal (LA); Brian Wineinger (IN)
Express Scripts Unjust Enrichment	ESIUE1	All individuals in California; Colorado; D.C.; Hawaii; Illinois; Indiana; Iowa; Kansas; Louisiana; Maine;	Any judge or magistrate presiding over this action, and members of their families;	Merilyn Andre (CA); Mark Hays (CA); Veronica Longwell (MA)
Grouping No. 1		Massachusetts; Mississippi; Missouri; Nevada; New Mexico; New York; North Carolina;	Defendants and affiliated entities, and their employees, officers, directors, and agents;	

		Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Express Scripts, Inc., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Defendants' legal representatives, assigns, and successors:  Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Express Scripts prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Kroger Unjust Enrichment Grouping No. 1	KROUEI	All individuals in California; Colorado; D.C.; Hawaii; Illinois; Indiana; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico; New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;	Merilyn Andre (CA); Leland Gildner (IN)

		final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant The Kroger, Co., and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Kroger prior to May 1, 2018;	
			All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Optum Rx Unjust Enrichment Grouping	OPTUE1	All individuals in California; Colorado; D.C.; Hawaii; Illinois; Indiana; Iowa; Kansas; Louisiana; Maine;	Any judge or magistrate presiding over this action, and members of their families;	Charlie Johnston (CA)
No. 1		Massachusetts; Mississippi; Missouri; Nevada; New Mexico; New York; North Carolina; Oklahoma; Oregon; South	Defendants and affiliated entities, and their employees, officers, directors, and agents;	
		Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of	Defendants' legal representatives, assigns, and successors;	
		final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing	Individuals whose only valsartan-containing drug purchases (intended for	
		drug (intended for personal or household use) that was dispensed by Defendant OptumRx, and manufactured,	personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-	

		distributed, or sold by any of the Manufacturer Defendants.	containing drugs dispensed by OptumRx prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	
Albertson's Unjust Enrichment Grouping No. 1	ALBUEI	All individuals in California; Colorado; D.C.; Hawaii; Illinois; Indiana; Iowa; Kansas; Louisiana; Maine; Massachusetts; Mississippi; Missouri; Nevada; New Mexico; New York; North Carolina; Oklahoma; Oregon; South Carolina; South Dakota; Tennessee; Utah; and Puerto Rico, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan-containing drug (intended for personal or household use) that was dispensed by Defendant Albertson's LLC (including Sav- On), and manufactured, distributed, or sold by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed by Albertson's (including Sav-On) prior to May 1, 2018;  All persons who properly execute and file a timely	Merilyn Andre (CA)

-	
	request for exclusion from any
	Court-approved class.

### WHOLESALER DEFENDANTS

# Wholesaler Defendants Unjust Enrichment Claim

Defendant(s)	Subclass Name	Definition	Exclusion(s)	Class Representative(s)
Wholesaler Defendants Unjust Enrichment State Grouping No. 1	WHUE1	All individuals in Texas, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.	Any judge or magistrate presiding over this action, and members of their families;  Defendants and affiliated entities, and their employees, officers, directors, and agents;  Defendants' legal representatives, assigns, and successors;  Individuals whose only valsartan-containing drug purchases (intended for personal or household use), who would otherwise meet this Class Definition, were Hetero Defendants' valsartan-containing drugs dispensed prior to May 1, 2018;  All persons who properly execute and file a timely request for exclusion from any Court-approved class.	Eric Erwin (TX); Brittney Means (TX); Jynona Gail Lee (TX); Samuel Cisneros (TX)
Wholesaler Defendants	WHUE2	All individuals in Alabama; and Montana, who, since at least	Id.	Asha Lamy (AL); Sandra Kelly (AL)

Unjust Enrichment State Grouping No. 2		January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.		
Wholesaler Defendants Unjust Enrichment State Grouping No. 3	WHUE3	All individuals in Arizona; Arkansas; Connecticut; Maryland; Minnesota; Rhode Island; Vermont; and Wyoming, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartan- containing drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.	Id.	Peter O'Brien (CT); Jennifer Johnson (MN)
Wholesaler Defendants Unjust	WHUE4	All individuals in Alaska; Delaware; Florida; Georgia; Idaho; Nebraska; New Jersey;	Id.	Ron Molinaro (FL); Elenora Deutenberg/Feijoo (FL); Lawrence Edwards (GA);

Enrichment		North Dakota; Ohio;		Lubertha Powell (GA); Marzanna
State		Pennsylvania; Virginia; and		Glab (NJ); Antoinette Sims (NJ);
Grouping		Washington, who, since at least		James Lawson (NJ); James
No. 4		January 1, 2012, and through the		Childs (NJ); Radhakrishna Shetty
		date of final recall (as of		(NJ); Dennis Kaplan (OH);
		November 10, 2021), paid any		Lawrence Semmel (PA); Robin
		amount of money for a valsartan-		Roberts (VA); Mary McLean
		containing drug (intended for		(VA); Cheryl Mullins (VA)
		personal or household use) that		
		was distributed in whole or in part		
		by Defendants Cardinal Health,		
		Inc., McKesson Corporation,		
		and/or AmerisourceBergen		
		Corporation, and manufactured in		
		whole or in part by any of the		
		Manufacturer Defendants.		
Wholesaler	WHUE5	All individuals in California;	Id.	Jay Meader (CA); Mark Hays
Defendants		Colorado; D.C.; Hawaii; Illinois;		(CA); Merilyn Andre (CA);
Unjust		Indiana; Iowa; Kansas; Louisiana;		Charlie Johnston (CA); Marlin
Enrichment		Maine; Massachusetts;		Anderson (IL); Brian Voneinger
State		Mississippi; Missouri; Nevada;		(IN); Joseph Kessinger (KS);
Grouping		New Mexico; New York; North		Talsie Neal (LA); Sandy Bell
No. 5		Carolina; Oklahoma; Oregon;		(LA); Linda Crocker (ME);
		South Carolina; South Dakota;		Veronica Longwell (MA); Flora
		Tennessee; Utah; and Puerto Rico,		McGilvery (MS); Billy Joe
		who, since at least January 1,		Bruner (NM); Alphonse
		2012, and through the date of final		Borkowski (NY); John Duffy
		recall (as of November 10, 2021),		(NY); Gerald Nelson (NY);
		paid any amount of money for a		Joseph Cacaccio (NY); Gary
		valsartan-containing drug		Burnett (NC); Miranda Dudley
		(intended for personal or		(NC)
		household use) that was		
		distributed in whole or in part by		

		Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.		
Wholesaler Defendants Unjust Enrichment State Grouping No. 6	WHUE6	All individuals in Kentucky, who, since at least January 1, 2012, and through the date of final recall (as of November 10, 2021), paid any amount of money for a valsartancontaining drug (intended for personal or household use) that was distributed in whole or in part by Defendants Cardinal Health, Inc., McKesson Corporation, and/or AmerisourceBergen Corporation, and manufactured in whole or in part by any of the Manufacturer Defendants.	Id.	Glenda Cooper (KY)